

SCAG_Comments

From: Nancy Pfeffer [PFEFFER@scag.ca.gov]
Sent: Thursday, February 07, 2002 3:53 PM
To: tara.dunn@dgs.ca.gov
Cc: Rich MACIAS
Subject: SCAG Staff Comments on ERIP

Appended below is the text of SCAG's staff comments on the CPA's Energy Resource Investment Plan. A signed letter to this effect will be mailed on Monday, February 11.

The Southern California Association of Governments (SCAG) is pleased to submit staff comments on the Power Authority's Energy Resource Investment Plan. SCAG is a council of governments serving a region that encompasses six counties (Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura) that are home to over 16 million people.

First, SCAG applauds the CPA's initiative in planning for the state's energy future outside a time of crisis. This is the best time to make reasoned judgments about critical issues such as energy supply, environmental impact, cost, and security.

However, SCAG feels that the CPA should conduct planning on a longer time horizon, not just to 2006. Given the slow pace of change in basic energy infrastructure, the plan should extend at least 20-25 years into the future. This horizon would better match related types of long-range planning, such as the transportation planning for which SCAG is responsible, and allow the planning processes to be more closely coordinated and integrated.

The draft plan projects that about seven times as many jobs would be created under the CPA's investment portfolio than under the "business-as-usual" investment portfolio. The final plan should include more information on the types, level, and salary of these additional jobs.

The draft plan does not acknowledge the need for local- and region-level planning. The CPA should consider making resources available for regional energy planning, or at a minimum should incorporate meaningful regional plan sections in the state plan. After all, the land use decisions that determine the actual location and nature of energy facilities are ultimately local decisions.

The Plan does not explicitly mention taking advantage of untapped waste-to-energy resources in the state. The plan should consider all available renewable energy sources, and waste-to-energy resources should be among them.

The draft plan mentions that its "Clean Growth" scenario will improve environmental justice compared to the "business as usual" scenario, but does not support this assertion with analysis. The CPA might consider including such analysis in its final Plan or subsequent documents.

SCAG appreciates the opportunity to provide these comments on the draft Investment Plan, and hopes the CPA finds them constructive. If you have any questions or want further information, please contact me at 213-236-1869 or pfeffer@scag.ca.gov.

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